

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TERRI LEE MEYER, :
 :
 Plaintiff, : No. 06-117-SLR
 :
 v. :
 :
 : CIVIL ACTION
 :
 PATRICK RYAN, COLLEEN :
 SHOTZBERGER, and GEORGE : JURY TRIAL DEMANDED
 O'CONNER, :
 :
 Defendants. :

**STIPULATION AND ORDER OF DISMISSAL
ADDENDUM B TO SETTLEMENT AGREEMENT**

All parties in the above captioned action, through undersigned counsel, hereby stipulate to dismiss the above referenced matter with prejudice and state as follows:

1. In accord with the Parties' Settlement Agreement, executed concurrently with this Stipulation of Dismissal, it is hereby stipulated and agreed, without admission of liability, that Defendants, and each of them, shall refrain from retaliation against Plaintiff Terri L. Meyer and shall follow all State and Federal law applicable to protection of inmate legal efforts and to preserving the right of inmate access to the Courts.

2. The above-captioned civil action shall be marked SETTLED, DISMISSED WITH PREJUDICE, as appropriate, and CLOSED by the Clerk of the Courts. The Court maintains jurisdiction to enforce the Parties' Settlement Agreement as necessary by petition of the parties.

SO ORDERED AND APPROVED:

Date: _____

SUE L. ROBINSON, CHIEF JUDGE

SO STIPULATED AND AGREED BY THE PARTIES:

TERRI L. MEYER, WCI Inmate

Name:

Date: _____

**PATRICK J. RYAN, Warden
Delores J. Baylor Women's Correctional
Institution**

Patrick J Ryan
Name:

Date: 3-4-'08

**COLLEEN SHOTZBERGER, Treatment
Services Administrator, Delores J. Baylor
Women's Correctional Institution**

Colleen T. Shotzberger
Name:

Date: 03/04/08

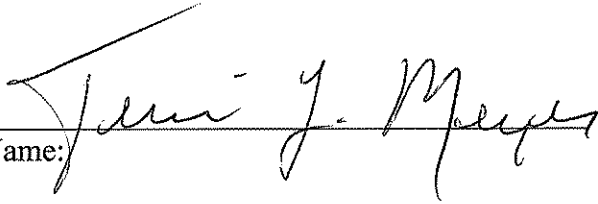
**GEORGE O'CONNOR, Librarian
Delores J. Baylor Women's Correctional
Institution**

George P. O'Connor
Name:

Date: 3/4/08

SO STIPULATED AND AGREED BY THE PARTIES:

TERRI L. MEYER, WCI Inmate

Name: 

Date: 2/28/08

**PATRICK J. RYAN, Warden
Delores J. Baylor Women's Correctional
Institution**

Name: _____

Date: _____

**COLLEEN SHOTZBERGER, Treatment
Services Administrator, Delores J. Baylor
Women's Correctional Institution**

Name: _____

Date: _____

**GEORGE O'CONNOR, Librarian
Delores J. Baylor Women's Correctional
Institution**

Name: _____

Date: _____

STATE OF DELAWARE

/s/Linda Carmichael

Linda M. Carmichael, Esquire (#3570)
Deputy Attorney General
Delaware Dept. of Justice
820 North French Street, 6th Floor
Wilmington, DE 19801
Phone: (302) 577-8400
Fax: (302) 577-6630
*Counsel for Defendants,
George O'Connor, Patrick Ryan, and
Colleen Shotzberger*

ACLU OF DELAWARE

/s/ Drewry N. Fennell

Drewry N. Fennell, Esquire
ACLU of Delaware
100 W. 10th Street, Suite 309
Wilmington, DE 19801
Phone: (302) 654-5326
Fax: (302) 654-3689
and

JACOBY DONNER, P.C.

/s/Liam Y. Braber

Christopher I. McCabe, Esq.
Liam Y. Braber, Esq.
1700 Market St., Ste. 3100
Philadelphia, PA 19103
Ph. (215) 563-2400
Fax. (215) 563-2870

Counsel for Plaintiff, Terri L. Meyer